

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION

ISLAM CHOMLAEV,)	
)	NO. _____
Plaintiff,)	
v.)	JUDGE _____
)	
MCLANE FOODSERVICE, INC. and ZO)	MAGISTRATE JUDGE
AUSTIN,)	_____
)	
Defendants.)	JURY DEMAND

NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEY

Notice is hereby given that defendant McLane Foodservice, Inc., in the above-styled cause heretofore filed in the Circuit Court for Shelby County, Tennessee, at Memphis, Tennessee, has this day filed in the District Court of the United States for the Western District of Tennessee, in the office of the Clerk thereof, in Memphis, Tennessee, a Notice of Removal of this cause from the state court to the District Court and have attached to the Notice of Removal the Complaint and other initial file documents. A copy of the Notice of Removal is attached hereto and served herewith.

This 22nd day of October 2021.

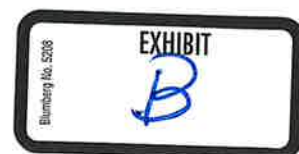
Respectfully submitted,

LEWIS THOMASON, P.C.

By: /s/Mary Beth White

Mary Beth White, BPR #24462
Paige Bernick, BPR #30071
424 Church Street, Suite 2500
Nashville, TN 37219
(615) 259-1366
mbwhite@lewisthomason.com
pbernick@lewisthomason.com

Attorneys for defendant McLane Foodservice, Inc.



CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEY has been served on the following counsel of record via email to:

Mohammed Farraj, Esq.
Morgan & Morgan – Memphis, LLC
80 Monroe Avenue, Suite 900
Memphis, TN 38103

This the 22nd day of October 2021.

/s/ Mary Beth White

IN THE CIRCUIT COURT FOR SHELBY COUNTY, TENNESSEE
AT MEMPHIS

ISLAM CHOMAEV,)	
)	
Plaintiff,)	
v.)	
)	NO. CT-3260-21
MCLANE FOODSERVICE, INC. and ZO)	
AUSTIN,)	
)	
Defendants.)	

NOTICE OF FILING OF NOTICE OF REMOVAL TO FEDERAL COURT

TO: Temiika D. Gipson, Clerk
Shelby County Circuit Court
140 Adams Avenue, Room 324
Memphis, TN 38103

Please take notice that defendant McLane Foodservice, Inc., by counsel, pursuant to 28 U.S.C. § 1441, *et seq.*, has filed in the United States District Court for the Western District of Tennessee, a Notice of Removal of the above-captioned cause of action from the Shelby County Court to the United States District Court for the Western District of Tennessee. A copy of the Notice of Removal is attached as Exhibit 1. The basis for removal of this cause of action is diversity jurisdiction and an amount in controversy exceeding \$75,000 which places original jurisdiction over this matter with the District Court. Pursuant to 28 U.S.C. § 1446(d), the Shelby County Court shall proceed no further on this case unless and until the case is remanded by the United States District Court for the Western District of Tennessee.

Please promptly acknowledge receipt and filing of this Notice and the copy of the Notice of Removal in your office by completing and signing the Acknowledgment found at the bottom of this Notice, an extra copy of which is enclosed for this purpose, with the request that it be returned when signed.

ACKNOWLEDGEMENT

I, Temiika D. Gipson, Circuit Court Clerk of Shelby County, Tennessee, do hereby acknowledge receipt of the above notice and papers referred to therein, and certify that I have on the date and hour below stated, filed the said copy of the Notice to remove this cause to the United States District Court, at Memphis, Tennessee, this ____ day of _____, 2021.

Circuit Court Clerk of Shelby County, TN

This 22nd day of October 2021.

Respectfully submitted,

LEWIS THOMASON, P.C.

By: /s/Mary Beth White

Mary Beth White, BPR #24462

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Attorneys for defendant McLane Foodservice, Inc.

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Mohammed Farraj, Esq.
Morgan & Morgan – Memphis, LLC
80 Monroe Avenue, Suite 900
Memphis, TN 38103

This the 22nd day of October 2021.

/s/ Mary Beth White